

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

CC FORD GROUP WEST, LLC,

*Plaintiff,*

v.

JENNIFER JOHNSON, CARRIE BICKING,  
BETH WEILER, PROJECT VELOCITY, INC.,  
PROJECT VELOCITY PARTNERS, LLC,  
MEREDITH MANNING,  
PHARMAESSENTIA USA CORP.,  
MATTHEW ORNELAS-KUH, and JOHN  
DOES 1-10,

*Defendants.*

No. 3:22-cv-04143 (MAS/TJB)

**[PROPOSED] STIPULATION AND ORDER TO EXCEED PAGE LIMITS FOR  
COMBINED MEMORADA IN SUPPORT OF AND IN OPPOSITION TO  
PHARMAESSENTIA’S AND MEREDITH MANNING’S MOTIONS TO DISMISS**

**WHEREAS**, on September 6, 2024, Plaintiff CC Ford Group West, LLC (“CCFW” or Plaintiff”) filed a Second Amended Complaint (“SAC”) in this matter (ECF-92);

**WHEREAS**, on November 8, 2024, Defendant PharmaEssentia USA Corp. (“PEC”) filed a request for leave to file excess pages, to wit: a combined memorandum in support of PEC’s motion to dismiss and Defendant Meredith Manning’s motion to dismiss not to exceed 45 pages (using 12-point proportional font);

**WHEREAS**, Plaintiff does not oppose PEC and Manning’s request to file a combined memorandum not to exceed 45 pages, provided that Plaintiff can file a combined opposition to PEC’s and Manning’s motions to dismiss not to exceed 45 pages (using 12-point proportional font);

**WHEREAS**, PEC and Manning do not oppose Plaintiff filing an opposition to PEC’s and Manning’s motions to dismiss not to exceed 45 pages (using 12-point proportional font); and

**WHEREAS**, Plaintiff does not oppose PEC and Manning filing a combined reply brief not to exceed 15 pages (using 12-point proportional font).

**IT IS HEREBY STIPULATED AND AGREED** by Plaintiff, PEC, and Manning that:

(1) Defendant PEC and Defendant Manning may file a combined memorandum in support of their motions to dismiss not to exceed 45 pages (using 12-point proportional font);

(2) Plaintiff may file a combined opposition to Defendant PEC's and Defendant Manning's combined motions to dismiss not to exceed 45 pages (using 12-point proportional font); and

(3) Defendant PEC and Defendant Manning may file a combined reply brief not to exceed 15 pages (using 12-point proportional font).

DATED: November 15, 2024

**MANDELBAUM BARRETT PC**

By: /s/  
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***Attorney for Defendant Meredith Manning***

**SO ORDERED**

Bongiovanni, Tonianne J., U.S.M.J.